

Jerold T. Everard, WSBA # 17142
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& EVERARD
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FILED
IN CLERKS OFFICE

2003 DEC 12 P 2:35

U.S. DISTRICT COURT
DISTRICT OF MASS.

03 CV 12506 WGY

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EK VENTURES I, LLC; DAVID L.
TAYLOR; and DAVID L. TAYLOR and
VIRGINIA L. TAYLOR as TRUSTEES
FOR THE TAYLOR FAMILY
REVOCABLE TRUST

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.
PUBLICATIONS, INC.,

Defendants.

No.

AFFIDAVIT OF JEROLD T. EVERARD
IN SUPPORT OF MOTION FOR
PERMISSION TO APPEAR PRO HAC
VICE

Jerold T. Everard, being duly sworn, deposes and states as follows:

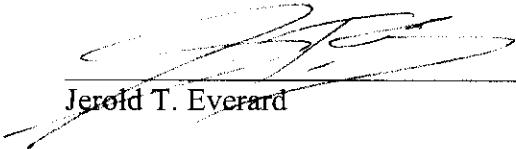
1. I, Jerold T. Everard, am a member of the Bar of the State of Washington in good standing, Washington State Bar Number 17142.
2. I am a member of the Bar of the United States District Court for the Western District of Washington.

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3. There are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
4. I have reviewed the Local Rules of the United States District Court for the District of Massachusetts and I am familiar with their contents.
5. I have a long-standing relationship with the primary plaintiff in this action, having represented them in the past. It is therefore appropriate that I continue to represent them in this matter in the U.S. District Court of Massachusetts.
6. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

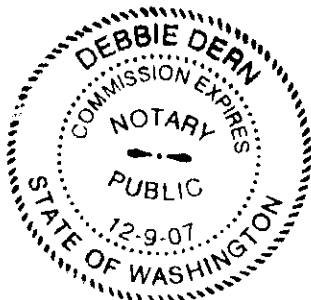
Dated this 11th day of December, 2003


Jerold T. Everard

State of Washington)
County of King) ss.

On this day personally appeared before me Jerold T. Everard to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that he signed the same as his free and voluntary act and deed, for the uses and purposes therein mentioned.

Given under my hand and official seal this 11th day of December, 2000.





Print Name: Debbie Dern

NOTARY PUBLIC in and for the State of Washington,
residing at 28715 106th Place SE, Monroe, WA 98272

My Appointment Expires: 12/9/07

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